

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION
OF JAMIE S. FELSEN, ESQ.**

Jamie S. Felsen, Esq. declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and am a member of Milman Labuda Law Group PLLC, who – along with Sage Legal LLC – are the attorneys for Plaintiff IME WatchDog, Inc. (“IME WatchDog”) in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by this office.

3. Annexed hereto as Exhibit “A” are documents produced by Eugene Liddie establishing the edible arrangement packages he sent to clients is March and May 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 8, 2024.

/s/ Jamie S. Felsen
Jamie S. Felsen, Esq.